

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

-against-

SEAN COMBS, DADDY'S HOUSE RECORDINGS, INC., CE OPCO, LLC d/b/a COMBS GLOBAL f/k/a COMBS ENTERPRISES LLC, BAD BOY ENTERTAINMENT HOLDINGS, INC., BAD BOY PRODUCTIONS HOLDINGS, INC., BAD BOY BOOKS HOLDINGS, INC., BAD BOY RECORDS LLC, BAD BOY ENTERTAINMENT LLC, BAD BOY PRODUCTIONS LLC, AND ORGANIZATIONAL DOES 1-10,

Defendants.

Case No. 24-cv-7777

**DECLARATION OF
MARK CUCCARO**

MARK CUCCARO declares as follows:

1. I am a partner at the law firm Sher Tremonte LLP, counsel for Sean Combs, Daddy's House Recordings Inc., CE OpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (collectively, the "Combs Defendants") in the above-captioned action. I have personal knowledge of the facts and circumstances set forth herein.

2. I submit this declaration in support of the Combs Defendants' motion, pursuant to Fed. R. Civ. P. 12(b)(6), for an order dismissing all claims in the Complaint, dated October 14, 2024 (ECF No. 1) against them with prejudice.

3. Attached as **Exhibit A** is a copy of an unpublished order of the Honorable Lewis A. Kaplan of this Court, in *Bellino v. Tallarico*, No. 1:24-cv-00712 (LAK), dated April 26, 2024, and filed that same date on ECF, at ECF #28.

4. Attached as **Exhibit B** is a copy of an unpublished decision and order of the Honorable Justice Lyle E. Frank of the New York State Supreme Court, New York County, in *Delgado v. Donald J. Trump for President, Inc.*, No. 952333/2023 (decision on Motion Sequence 004). The decision is dated January 30, 2025, and was filed on the New York State electronic filing system on February 3, 2025, at NYSCEF Doc. #127.

5. Attached as **Exhibit C** is a copy of the Entity Information Report for CE OpCO, LLC, obtained from the State of Delaware's Division of Corporations Database at the URL <https://icis.corp.delaware.gov/ecorp/> on February 14, 2025, which states that the formation date of this entity was May 31, 2002.

6. Attached as **Exhibit D** is a copy of the Entity Information Report for Bad Boy Books Holdings, Inc., obtained from New York State's Corporation and Business Entity Search Database at the URL <https://apps.dos.ny.gov/publicInquiry/> on February 7, 2025, which states that this entity is a domestic corporation with an initial Department of State filing date of October 2, 1998.

7. Attached as **Exhibit E** is a copy of the Entity Information Report for Bad Boy Entertainment LLC, obtained from New York State's Corporation and Business Entity Search Database at the URL <https://apps.dos.ny.gov/publicInquiry/> on February 7, 2025, which states that this entity is a domestic company with an initial Department of State filing date of March 13, 2014.

8. Attached as **Exhibit F** is a copy of the Entity Information Report for Bad Boy Productions LLC, obtained from New York State's Corporation and Business Entity Search

Database at the URL <https://apps.dos.ny.gov/publicInquiry/> on February 7, 2025, which states that this entity is a domestic company with an initial Department of State filing date of March 13, 2014.

Dated: February 18, 2025
New York, New York

Respectfully submitted,

SHER TREMONTE LLP

/s/ Mark Cuccaro

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